

LAQUER, URBAN, CLIFFORD & HODGE LLP

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Counsel for Plaintiffs, Trustees of the Operating Engineers Pension Trust, et al.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TRUSTEES OF THE OPERATING
ENGINEERS PENSION TRUST,
TRUSTEES OF THE OPERATING
ENGINEERS HEALTH AND WELFARE
FUND, TRUSTEES OF THE OPERATING
ENGINEERS VACATION-HOLIDAY
SAVINGS TRUST, TRUSTEES OF THE
OPERATING ENGINEERS TRAINING
TRUST, TRUSTEES OF THE
OPERATING ENGINEERS LOCAL 12
DEFINED CONTRIBUTION TRUST,
ENGINEERS CONTRACT COMPLIANCE
COMMITTEE FUND, and SOUTHERN
CALIFORNIA PARTNERSHIP FOR JOBS
FUND,

Plaintiffs,

v.

T & D SERVICES INC., a Nevada
Corporation doing business in California as
"T & D TRENCHLESS,"

Defendant.

Case No.: 5:24-CV-00083-SSS-SHK
ASSIGNED TO THE HONORABLE
SUNSHINE SUZANNE SYKES

**STIPULATION FOR ENTRY
OF JUDGMENT**

1 TO THE HONORABLE SUNSHINE SUZANNE SYKES, UNITED STATES
2 DISTRICT COURT JUDGE:

3 **IT IS HEREBY STIPULATED AND AGREED**, by and among Plaintiffs,
4 Trustees of the Operating Engineers Pension Trust, et al. (collectively, the
5 “Trustees”), and Defendant, T & D Services Inc., a Nevada corporation doing
6 business in California as “T & D Trenchless” (“T&D”), that, subject to the approval of
7 the Court:

8 1. With regard to the claims raised by Trustees in the within lawsuit, T&D
9 is liable to the Trustees in the amount of \$460,403.23.

10 2. Judgment shall be entered against T&D and in favor of Trustees, in the
11 amount of \$460,403.23, plus post-judgment interest calculated at 8% per annum from
12 March 1, 2024, until paid in full, in the form attached hereto as **Exhibit 1**.

13 **IT IS SO STIPULATED.**

14
15 DATED: March 15, 2024

LAQUER, URBAN, CLIFFORD & HODGE LLP

16 By: /s/ Andrew Q. Thompson

17 Andrew Q. Thompson, Attorney for Plaintiffs,
18 Trustees of the Operating Engineers Pension
19 Trust, et al.

20 DATED: March 15, 2024

T & D SERVICES INC., a Nevada corporation doing
21 business as “T & D Trenchless”

22 By: /s/ Timothy P. Creyaufmiller

23 Timothy P. Creyaufmiller, Attorney for
24 Defendant, T & D Services Inc.

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i) regarding signatures, Andrew Quinn Thompson hereby attests that concurrence in the filing of this document has been obtained from all other signatories identified above.

DATED: March 15, 2024

By: /s/ Andrew Quinn Thompson
Andrew Quinn Thompson